

**TECHNICAL REVIEW AND EVALUATION FOR SIGNIFICANT REVISION #45014 TO
OPERATING AIR QUALITY PERMIT #101222
LIQUIDTITAN LLC**

I. INTRODUCTION

This Significant Permit Revision No. 45014 to Operating Permit No. 1001222 is proposed to be issued to LiquidTitan, LLC for operation of a 347-KW emergency diesel generator at their transmix processing facility located at Parker, Arizona.

A. Company Information

Facility Name: LiquidTitan, LLC

Mailing Address: 31645 Industrial Lane
Parker, AZ 85334

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Parker, AZ 85334

B. Attainment Classification

The transmix processing facility of LiquidTitan, LLC is located in an area which is attainment or unclassified for criteria pollutants.

C. Learning Sites Evaluation

There are no learning sites within 2 miles of the facility.

II. BACKGROUND INFORMATION

The facility was issued a Class II permit (Number 1001222) in April 2004, for the operation of a transmix processing facility. A Class II Minor Revision No. 40965 was issued to Liquid Titan LLC for

1. Increase in capacity of reboiler heater from 10.0 MMBtu/hr to 12.6 MMBtu/hr
2. Increase in the capacity of used oil heater from 5.0 MMBtu/hr to 6.5 MMBtu/hr
3. Addition of a new cooling tower (Capacity: 200 cfm)
4. Operation of used oil system including 8 tanks (annual capacity 15.33million gallons per year)

Later, a significant permit revision #42759 was issued for increasing the processing limit from 28,140,000 gallons of transmix to 56,280,000 gallons per year

III. REVISION DESCRIPTION

Through this permit revision, the facility is permitted to operate a 347-kw emergency diesel generator. The facility has accepted a voluntary operating hour limitation of 200 hours for the emergency generator. The increase in emissions due to this revision and new facility-wide emissions are shown in the table below:

Pollutant	Potential emissions (with controls) prior to revision	Potential increase in emissions due to addition of generator	Potential emissions (new)
	tpy	tpy	tpy
CO	5.94	0.31	6.25
NO _x	24.64	1.44	26.08
SO ₂	61.97	0.10	62.07
PM	6.20	0.10	6.30
PM ₁₀	4.77	0.10	4.88
VOC	18.81	0.11	18.93

IV. APPLICABILITY EVALUATION FOR STATE TOXIC PROGRAM

The facility is minor source of Hazardous air pollutants (HAPs) as the total HAPs emissions are less than 10 tons per year. As the facility is covered minor source pursuant to Table 2 of Article 17 of A.A.C. R18-2, and the emissions of HAPs are more than 2.5 tons per year, an evaluation was performed to verify if HAPs emission increase caused by the change exceed de minimis amounts for the HAPs listed under Table 1 of Article 17 of A.A.C. R18-2.

Hazardous Air Pollutant	Annual Emissions	Daily Emissions	% of Hourly De Minimis	% of Annual De Minimis
	tpy	lb/hr	%	%
Naphthalene	2.76E-05	2.76E-04	N/A	15.77
Benzene	3.04E-04	3.04E-03	N/A	40.53
Toluene	1.33E-04	1.33E-03	0.00	0.00
Xylenes	9.28E-04	9.28E-03	0.01	0.29
1,3 Butadiene	1.27E-05	1.27E-04	N/A	6.51
Formaldehyde	3.84E-04	3.84E-03	N/A	85.33
Acetaldehyde	2.50E-04	2.50E-03	N/A	9.43
Acrolein	3.04E-05	3.04E-04	2.34	47.13

N/A: The referenced pollutants do not have a hourly de minimis trigger in the state toxics program.

The above analysis indicates that emissions of HAPs listed are less than the de minimis amounts for the hourly and annual emissions. Hence the requirements of Article 17 of A.A.C. R18-2 are not applicable to this change.

V. APPLICABLE REQUIREMENTS

There are no new applicable requirements.

VI. MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS

- A. The Permittee is required to keep records of monthly total of the hours of operation for emergency generator. At the end of each month, the Permittee is required calculate and record a rolling 12-month total of the hours of operation.

- B. The Permittee is required to conduct a quarterly survey of visible emissions emanating from the emergency generator, when in operation. If the opacity of the emissions observed appears to exceed the standard, then the observer must conduct a certified EPA Reference Method 9 observation. If the Method 9 reading indicates exceedance of the standard, the Permittee is required to take corrective action and log such activities.

VII. LIST OF ABBREVIATIONS

A.A.C.	Arizona Administrative Code
ADEQ	Arizona Department of Environmental Quality
CO	Carbon Monoxide
EPA	Environmental Protection Agency
NO _x	Nitrogen Oxides
PM	Particulate Matter
PM ₁₀	Particulate Matter Nominally less than 10 Micrometers
SO _x	Sulfur Oxides
TPY	Tons per Year
VOC	Volatile Organic Compound